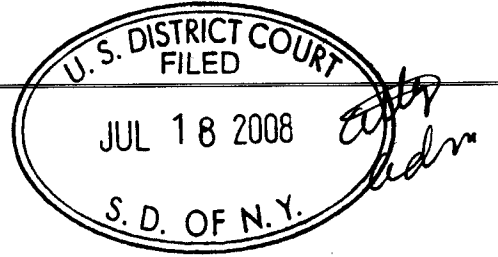


SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK



PAUL ABELMAN, et al.,

Plaintiff,

Civil Action No. 08 Civ. 3317 (BSJ)

- against -

MOTION TO ADMIT COUNSEL

COLGATE-PALMOLIVE COMPANY,
et al.,

PRO HAC VICE

Defendant.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, **Theresa J. Chung**, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of the following attorneys:

Applicant's Name: Jeremy P. Blumenfeld
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103-2921
Phone Number: (215) 963-5000
Fax Number: (215) 963-5001

and

Applicant's Name: Joseph J. Costello
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103-2921
Phone Number: (215) 963-5000
Fax Number: (215) 963-5001

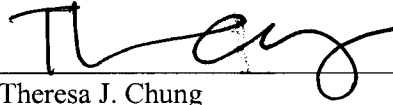
Jeremy P. Blumenfeld and Joseph J. Costello are members in good standing of the Bar of the State of Pennsylvania and of the Eastern District of Pennsylvania.

There are no pending disciplinary proceedings against Jeremy P. Blumenfeld and Joseph J. Costello in any State or Federal court.

Dated: July 17, 2008

City, State: Washington, District of Columbia

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Theresa J. Chung', is written over a horizontal line.

Theresa J. Chung
SDNY Bar TC3200
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Phone: 202-739-3000
Fax: 202-739-3000
Email: tchung@morganlewis.com

Attorney for the Defendants

SDNY (Rev. 10/2006) Affidavit in Support of Motion to Admit Counsel Pro Hac Vice

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

PAUL ABELMAN, et al.,

Plaintiff,

Civil Action No. 08 Civ. 3317 (BSJ)

- against -

COLGATE-PALMOLIVE COMPANY,
et al.,

Defendant.

~~MOORE~~ TO ADMIT COUNSEL
Affidavit PRO HAC VICE

State of New York)
) ss:
County of New York)

Theresa J. Chung, being duly sworn, hereby deposes and says as follows:

1. I am associated with the law firm of Morgan, Lewis & Bockius and counsel for the Defendants in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Jeremy P. Blumenfeld and Joseph J. Costello as counsel pro hac vice to represent the Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on June 24, 2003. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Jeremy P. Blumenfeld and Joseph J. Costello since November of 2004.
4. Jeremy P. Blumenfeld and Joseph J. Costello are Partners at Morgan, Lewis & Bockius in Philadelphia, Pennsylvania.
5. I have found Mr. Blumenfeld and Mr. Costello to be skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Jeremy P. Blumenfeld and Joseph J. Costello, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Jeremy P. Blumenfeld and Joseph J. Costello, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jeremy P. Blumenfeld and Joseph J. Costello, pro hac vice, to represent the Defendants in the above captioned matter, be granted.

Dated: July 17, 2008

City, State: Washington, District of Columbia

Notarized:

Respectfully submitted,

District of Columbia: SS
Subscribed and Sworn to before me, in my presence,
this 17th day of July, 2008
[Signature]
Notary Public, D.C.
My Commission Expires 2/14/2010

[Signature]
Theresa J. Chung
SDNY Bar TC3200

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA

}

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Joseph J. Costello , Bar # 44327, was duly admitted to practice in said Court on November 21, 1985 , and is in good standing as a member of the bar of said Court.

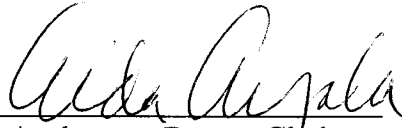
DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on July 15, 2008.

BY



Aida Ayala,

Deputy Clerk

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA



I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Jeremy P. Blumenfeld , Bar # 85955, was duly admitted to practice in said Court on December 14, 2000, and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on July 15, 2008.

BY

A handwritten signature in cursive script, appearing to read "Aida Ayala", is written over a horizontal line.

Aida Ayala,

Deputy Clerk

✓

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2008, a copy of the foregoing MOTION TO ADMIT COUNSEL *PRO HAC VICE* and the DECLARATION OF THERESA CHUNG in Support of Motion to Admit Counsel *pro hac vice* was mailed first-class to all counsel of record:

Eli Gottesdiener
Gottesdiener Law Firm, PLLC
498 7th Street
Brooklyn, NY 11215

William Henry Blessing
119 East Court Street
Suite 500
Cincinnati, OH 45202

Attorneys for Plaintiffs



Theresa J. Chung (TC3200)

EXHIBIT A

SDNY (Rev. 10/2006) Order for Admission Pro Hac Vice on Written Motion

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

PAUL ABELMAN, et al.,

Plaintiff,

- against -

COLGATE-PALMOLIVE COMPANY,
et al.,

Defendant.

Civil Action No. 08 Civ. 3317 (BSJ)

ORDER
MOTION TO ADMIT COUNSEL

PRO HAC VICE

Upon the motion of Theresa J. Chung, attorney for the Defendants Colgate-Palmolive Company, Colgate-Palmolive Company Employees' Retirement Income Plan, and ERC and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Jeremy P. Blumenfeld
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103-2921
Phone/Fax: (215) 963-5000/(215) 963-5001
Email Address: jblumenfeld@morganlewis.com

and

Applicant's Name: Joseph J. Costello
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103-2921
Phone/Fax: (215) 963-5000/(215) 963-5001

Email Address: jcostello@morganlewis.com

are admitted to practice pro hac vice as counsel for Defendants Colgate-Palmolive Company, Colgate-Palmolive Company Employees' Retirement Income Plan, and ERC in the above captioned case in the United States District for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: _____, 2008

City, State: New York, New York

United States District/Magistrate Judge